STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
400 P Street, 4th Floor
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Sacramento, CA 95812-0806
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October 22, 1991

Mr. George Adams, Jr.
President
Adams International Metals, Inc.
3200 Frontera Road
Anaheim, California 92806

Dear Mr. Adams:

REGULATION OF THE COARSE PORTION OF AUTO SHREDDER WASTE

This letter is in response to our August 12 and August 13, 1991 telephone conversations and subsequent inquiries from the Orange County Environmental Health Department. I wanted to reiterate the Department of Toxic Substances Control's (Department's) position regarding the regulation of the auto shredder waste being generated by your facility, as well as clarify some points which may not have been communicated adequately in the Department's correspondence.

In a letter dated December 19, 1988, the Department classified Adams International Metals, Incorporated's (AIM's)[1] treated auto shredder waste as nonhazardous because it possesses mitigating physical and/or chemical characteristics which render it an insignificant hazard to human health and safety and the environment. This classification was made pursuant to the provisions of Section 66305(e) [now Section 66260.200(f)], Title 22, California Code of Regulations (22 CCR).

Prior to treatment, the auto shredder waste was demonstrated to contain soluble and total concentrations of several heavy metals which exceeded their Soluble Threshold Limit Concentrations (STLCs) and Total Threshold Limit Concentrations (TTLCs) found in §66699(b) [now §66261.24(a)(2)], 22 CCR. However, after treatment using a polysilicate solution and cement which "fix" the metals, the solubility of the metals decreases. The December 19, 1988 letter states that, when the auto shredder waste is treated, none of the concentrations of metals (except lead), as measured by the Waste Extraction Test (WET), exceed their respective STLCs. WET-soluble lead levels did not exceed 50 mg/l. In addition, polychlorinated biphenyls (PCBs) did not exceed the TTLC of 50 mg/kg.

Prior to the treatment, the smaller particles of auto shredder waste are separated from the larger particles. Only the smaller particles are treated with the polysilicate

[1]Formerly known as Orange County Steel Salvage, Incorporated.

recycled paper

solution and cement. After the treated smaller particles are allowed to cure, they are tested to determine that the metals are nonsoluble. If the treatment is determined to have succeeded (i.e., none of the WET-soluble metals concentrations exceed their respective STLCs except lead, which doesn't exceed 50 mg/l), the treated smaller particles are then remixed with the larger particles of auto shredder waste and the mixture is sent for disposal.

The Department's December 19, 1988 classification letter does not mention whether the waste that was classified as nonhazardous was strictly the treated smaller particles or the combined mixture. However, data which the Department reviewed in support of its nonhazardous classifications of auto shredder waste indicate that the larger particles exhibit the same characteristics as the treated fine particles of auto shredder waste (i.e., all inorganic constituents except lead are present in concentrations below their respective STLCs; lead is present in concentrations below 50 mg/l).

The December 19, 1988 determination states that the determination is valid as long as the waste characteristics, and the processes generating the wastes, do not change such that the data provided to the Department no longer support the conclusions drawn in the determinations. It is the waste generator's responsibility to ensure that these conditions are consistently met. This may involve periodic sampling to confirm these conditions. If the untreated larger particles are sampled and found to contain soluble metals in excess of previously measured levels, the larger particles would be considered hazardous waste and could <u>not</u> be recombined with the treated smaller particles.

If you have any further questions, you can contact me at the letterhead address or telephone number.

Sincerely,

Richard E. Brausch
Alternative Technology Division

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